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**MEMO ENDORSED** 

The Application is granted.

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OPPERED:

Paul G. Gardephe, U.S.D.J

Dated: September 23, 2021

## BY ECF

Hon. Paul G. Gardephe United States District Judge United States District Court Southern District of New York 40 Foley Square New York, New York 10007

Re:

Reyes Silva, et al v. Le

Docket No.: 16-cv-035

Your Honor:

Our office represents Plaintiffs in the above-referenced matter. We write to respectfully request a second brief extension of the deadline to submit a proposed attorneys' fee application and proposed calculation of pre-judgment interest, from today, September 22, 2021 to Thursday, September 23, 2021. This is the second request of its kind. The Court granted Plaintiffs' first request.

Our office is in the final stages of preparing the proposed application and calculation but needs one more brief extension of time to finalize same.

Once again, our office called the *pro se* Defendant, Min Xing Wang, to obtain consent for the within application. However, when he called him, we received a recording stating that the service we were trying to use was restricted or unavailable. Therefore, we did not obtain his consent.

Our office will consent to an equivalent extension for the *pro se* Defendant to respond to Plaintiffs' proposed application and calculation, from September 29, 2021 to September 30, 2021.

Again, we apologize for the delay in making this request.

Plaintiffs thank the Court for its time and consideration of this matter.

Respectfully Submitted,

/s/ William K. Oates, Esq. William K. Oates